

1 Michele R. Stafford, Esq. (SBN 172509)  
Shivani Nanda, Esq. (SBN 253891)  
2 SALTZMAN & JOHNSON LAW CORPORATION  
44 Montgomery Street, Suite 2110  
3 San Francisco, CA 94104  
(415) 882-7900  
4 (415) 882-9287 – Facsimile  
[mstafford@sjlawcorp.com](mailto:mstafford@sjlawcorp.com)  
5 [snanda@sjlawcorp.com](mailto:snanda@sjlawcorp.com)

6 Attorneys for Plaintiffs

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8 UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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11 BAY AREA PAINTERS AND TAPERS  
PENSION TRUST FUND, et al.

12 Plaintiffs,

13 v.

14 J.F. McCRAY PLASTERING, INC., a  
15 California Corporation,

16 Defendant.

Case No.: C14-0604 SI

**PLAINTIFFS' REQUEST TO CONTINUE  
CASE MANAGEMENT CONFERENCE;  
[PROPOSED] ORDER THEREON**

Date: January 23, 2015

Time: 2:30 p.m.,

Dept.: Courtroom 10, 19th Floor, San  
Francisco, CA

Judge: Honorable Susan Illston

17  
18 Plaintiffs herein respectfully request that the Case Management Conference, currently on  
19 calendar for January 23, 2015 be continued for approximately sixty (60) days. Good cause exists  
20 for the continuance, as follows:

21 1. As the Court's records will reflect, this action was filed on February 7, 2014 to  
22 collect unpaid contributions and related amounts owed to Plaintiffs for work performed by  
23 Defendant's employees.

24 2. Defendant was served with the Complaint on March 12, 2014, and a Proof of  
25 Service of Summons was filed with the Court on March 31, 2014. Defendant failed to plead or  
26 otherwise respond to the lawsuit, and the Clerk entered Defendant's default on April 7, 2014.

27 3. Plaintiffs have made several attempts to resolve this matter informally with  
28 Defendant. However, Defendant has failed to respond and appears to have ceased operations.

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**REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE**  
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5. The Court continued the previously scheduled Case Management Conference to allow time for Plaintiffs to attempt to resolve this matter informally by collecting payments from either the general contractors and/or the surety.

7. There are no issues that need to be addressed by the parties at the currently scheduled Case Management Conference. In the interest of conserving costs, as well as the Court's time and resources, Plaintiffs respectfully request that the Case Management Conference be continued for approximately sixty (60) days to allow sufficient time for Plaintiffs to continue their attempts to resolve this matter informally.

Executed this 16<sup>th</sup> day of January 2015, at San Francisco, California.

Shivani Nanda  
Attorney for Plaintiffs

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to 3/20/15, at 3 pm. All related deadlines are extended accordingly

  
UNITED STATES DISTRICT JUDGE

**PROOF OF SERVICE**

I, the undersigned, declare:

1. I am a citizen of the United States and am employed in the County of San Francisco, State of California. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

2. I am over the age of eighteen and not a party to this action.

3. On **January 16, 2015**, I served the following document(s):

**PLAINTIFFS' REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE;  
[PROPOSED] ORDER THEREON**

on the interested parties in said action by enclosing a true and exact copy of each document in a sealed envelope and placing the envelope for collection and First Class mailing following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

4. The envelopes were addressed and mailed as follows:

**J.F. McCray Plastering, Inc.  
2590 South River Road  
West Sacramento, CA 95691**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **January 16, 2015**, at San Francisco, California.

\_\_\_\_\_/S/  
Elise Cotterill  
Paralegal